

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

EUGENE WESTMORELAND,

Plaintiff,

v.

THOMAS J. DART, et al.

Defendants

Case No. 23-cv-1851

Judge Tharp, Jr.

Magistrate Judge Gilbert

**DEFENDANT COOK COUNTY'S AMENDED ANSWERS TO PLAINTIFF
EUGENE WESTMORELAND'S FIRST SET OF INTERROGATORIES #3-5**

NOW COMES Defendant, COOK COUNTY (hereinafter "Defendant"), by and through its attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, and for its answers to Plaintiff's Interrogatories, states as follows:

INTERROGATORIES

1. From March 24, 2021 to the present, identify the number of detainees assigned to the Residential Treatment Unit (RTU) who have been prescribed a wheelchair to use at all times

ANSWER: This interrogatory seeks information that is not in the possession of Defendant Cook County. Cook County does not control detainee assignments.

2. From March 24, 2021 to the present, identify the number of detainees who have been prescribed a wheelchair to use for long distances.

ANSWER: OBJECTION. This interrogatory seeks information not in the possession of Defendant Cook County.

3. On March 8, 2021 at 2:53 PM, Timothy Tyrrell wrote the following in an e-mail:

Also, I checked the ramp from the same tunnel going into the basement of Division 8 – this appears to be slightly out of compliance. I can show you or Sabrina this as well. Looks to be like whomever did the concrete work is to blame for this. Might want to add this one in as well if county is having someone make these ADA Compliant. Let me know if you need anything further.

Dkt. 8-5 at 1-2. Identify, with reasonable specificity, the ramp referenced in this portion of Mr. Tyrrell's e-mail.


ANSWER: The ramp is east of the RTU in the underground tunnel system.

4. After Mr. Timothy Tyrrell wrote the e-mail on March 8, 2021 at about 2:53 PM, *see* Dkt. 8-5 at 1-2, describe the action taken, if any, by defendant to assess whether the ramp referenced by Mr. Tyrrell complied with the structural standards set by the ADA.

ANSWER: The County is in the process of hiring an ADA consultant to inspect the area.

5. From March 8, 2021 to the present, describe the action taken by defendant to modify the ramp referenced in Mr. Tyrrell's e-mail for compliance with the ADA structural standards.

ANSWER: The County is in the process of hiring an ADA consultant to inspect the area.

By: 
Eric Davis
Eric Davis, AIA
Deputy Director – Cook County
Dept. of Capital Planning and Policy

FOR OBJECTIONS: /s/ Jason E. DeVore

Jason E. DeVore, One of the
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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that **Defendant Cook County's Amended Answers to Plaintiff's First Set of Interrogatories #3-5** were sent via email correspondence to all below listed parties on August 4, 2023.

/s/ Zachary G. Stillman
Zachary G. Stillman
One of the Attorneys for Defendants

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**VERIFICATION FOR DEFENDANT COOK COUNTY'S ANSWERS TO PLAINTIFF'S
INTERROGATORIES**

I, Eric Davis, Deputy Director of Capital Planning and Policy – Cook County Bureau of Asset Management, under penalties as provided by law pursuant to 28 U.S.C. § 1746, certify that the statements set forth in *Defendant Cook County's Amended Answers to Plaintiff's Interrogatories #3-5*, are true and correct to the best of my inquiry, knowledge, and belief. The statements provided herein are not based on my personal knowledge, sole or personal recollection, or memory, but rather were gathered by reviewing the records and documents in possession of Cook County, by consulting persons employed by Cook County, in coordination with and upon advice of undersigned counsel of record in this litigation.

Dated: 8/3/2023



Eric Davis
Deputy Director of Capital Planning and Policy
Cook County Bureau of Asset Management